

MISCELLANEOUS REGULATIONS

State of Nevada
Gaming Control Board

Auditor's Name and Date

Internal Audit Compliance Checklist

**MISCELLANEOUS REGULATIONS
WALK-THROUGH PROCEDURES**

Licensee: _____ Review Period: _____

NGC Regulation 6.090(15) requires the internal auditor to use guidelines, checklists and other "criteria established by the chairman" in determining whether a Group I licensee is in compliance with applicable statutes, regulations, and Minimum Internal Control Standards (MICS). The use of this checklist satisfies these requirements.

Date of Inquiry	Person Interviewed	Position

Checklist Completion Notes:

- 1) Unless otherwise instructed, examine a completed document for compliance for those questions referring to records/documentation as indicated and recalculate where appropriate. Indicate (by tickmark) whether the procedures were confirmed via examination/review of documentation, through inquiry of personnel or via observation of procedures. Tickmarks used are to be defined at the bottom of each page.
- 2) All "no" answers require referencing and/or comment, and should be cited as regulation violations, unless the Board Chairman has granted a Regulation waiver or the question requires a "no" answer for acceptability. All exceptions noted should be carried to the internal auditor's report/summary of findings for timely follow-up.

Scope:

This checklist must be completed once in each fiscal year.

Regulation Waivers:

Obtain copies of regulation waiver requests and GCB correspondence regarding such requests from appropriate property personnel. Review to determine status of evidence of any waivers or alternative requirements imposed by granted waivers. Modify and/or perform additional procedures as applicable.

Date Approval Granted	Regulation	Description of Waiver Granted	Number(s) of Procedure Modified or Added	W/P Ref. (if appl.)

Note: Waivers need only be scheduled once. Refer to the workpaper where the details are scheduled and complete the last two columns of the above grid if walk-through procedures are affected.

Verified per representation

Verified per observation/examination

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Questions	Yes	No	N/A	Comments, W/P Reference
Regulation 5.105				
1. Is documentation maintained indicating that the Board was provided with the name, social security number and date of birth of any employee being granted access to the Board's system of records? Regulation 5.105(3)				
2. Is documentation maintained indicating that the Board was notified upon the termination of employment of such employee or the reassignment of such employee mentioned in the previous step to a position that no longer requires the employee to access the Board's system of records? Regulation 5.105(3)				
3. Does such employee mentioned in #1 or the licensee know that the information contained within the Board's system of records is confidential and must not be disclosed? Regulation 5.105(3)				
Regulation 5.115 Periodic payments				
4. For periodic payments that were won this year, obtain the contracts (annuity, letter of credit, trust fund, etc.) which guarantee funding of the periodic payments. Have these contracts been approved by the Chairman of the Gaming Control Board or the Nevada Gaming Commission, as appropriate? Regulation 5.115(3)				

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5. Are periodic payments offered only for potential payouts which exceed \$100,000? Regulation 5.115(5)				
6. Are signs displayed on gaming devices or in each gaming/tournament/promotional area, as appropriate, indicating the amount or terms of the periodic payments? Regulation 5.115(7)				
7. Regarding any game, etc. where winnings are to be made via periodic payments, does all associated radio, television or print advertising indicate periodic payments are to be made? Regulation 5.115(7)				
8. When the reserve method is used for funding periodic payments, are the conditions prescribed by the chairman met? Regulation 5.115(3)(c)				
Regulation 5.170 Programs to address problem gambling 9. Has the licensee posted in conspicuous places in or near gaming areas, cage areas and cash dispensing machines located in gaming areas materials concerning the nature and symptoms of problem gambling and the toll-free telephone number of the National Council on Problem Gambling or a similar entity approved by the chairman of the Board that provides information and referral services for problem gamblers? Regulation 5.170(2)				

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10. Has a training program been implemented for all employees who interact with patrons in gaming areas addressing problem gaming behavior? Regulation 5.170(3)				
11. Have personnel been designated as responsible for maintaining the program and addressing the types and frequency of training and procedures? Regulation 5.170(3) Indicate the title(s) of personnel involved.				
12. If the licensee issues credit, cashes checks or distributes promotional materials for gaming opportunities, has a program been established whereby patrons may self-limit their access to gaming? Regulation 5.170(4)				
13. Does the program include, as appropriate, the following elements: a. The development of written materials for dissemination to patrons explaining the program? Regulation 5.170(4)				
b. The development of written forms allowing patrons to participate in the program? Regulation 5.170(4)				

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Questions	Yes	No	N/A	Comments, W/P Reference
c. Standards and procedures that allow a patron to be prohibited from access to check cashing, the issuance of credit, and the participation in promotional activities? Regulation 5.170(4)				
d. Standards and procedures that allow a patron to be removed from the licensee's direct mailing and other direct marketing regarding gaming opportunities at that licensee's location? Regulation 5.170(4)				
e. Procedures and forms requiring the patron to notify a designated office of the licensee within 10 days of the patron's receipt of any financial gaming privilege, material or promotion covered by the program? Regulation 5.170(4)				
<p>14. Select one gaming employee (such as a dealer or a cage cashier) and pose the following question:</p> <p>"If a patron were to tell you that he needed help in controlling his or her gambling, what resources would you direct him or her to?"</p> <p>Was the employee knowledgeable about the programs established at that property? Regulation 5.170(3)</p> <p>Indicate any remarks of significance made by the employee interviewed.</p>				

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International Gaming Salon 15. When an international gaming salon is being operated, perform the necessary procedures to determine whether the international gaming salon operation is in compliance with Regulation 5.200(3)				
Drawings 16. Observe a minimum of one drawing in any gaming area during the fiscal year to determine whether the drawing was conducted in accordance with conditions provided to the patrons. Regulation 6.090(13) Note: Refer to the Minimum Internal Control Standard of the applicable section addressing promotional drawings (e.g., Table Games MICS #132 – 134 and #168).				
<u>Procedures Modified or Added</u>				

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Preparation:

Obtain the most recent Board issued "Listing of Individuals who have been Denied a Gaming License, been Found Unsuitable for Licensure or had a Gaming License or Finding of Suitability Revoked by the Nevada Gaming Commission". This listing should be obtained from appropriate property personnel. Be cognizant of these individuals in the performance of the various testing procedures. Agreements or contracts with these individuals are prohibited pursuant to **NRS 463.165**, unless prior Nevada Gaming Commission approval was received.

Checklist Completion Notes:

- 1) Unless otherwise instructed, examine a completed document of the licensee for compliance for those questions referring to records/documentation as indicated and recalculate where appropriate. Only those documents of the operating licensee need be examined/reviewed. Indicate (by tickmark) whether the procedures were confirmed via examination/review of documentation, through inquiry of personnel or via observation of procedures. Tickmarks used are to be defined at the bottom of each page.
- 2) All "no" answers require referencing and/or comment, and should be cited as regulation violations, unless the Board Chairman has granted a regulation waiver or the question requires a "no" answer for acceptability. All exceptions noted should be carried to the internal auditor's report/summary of findings for timely follow-up.

Scope:

See individual procedures.

Procedures	Step completed without exception	Exception/Comment
1. Review prior internal audit reports. Schedule any relevant exceptions cited, including those cited by the GCB or the CPA, or include a copy of the prior audit reports in the workpapers and follow up on any problems noted. Duplication of exceptions when the CPA is referring to exceptions reported in internal audit reports is not necessary.		

✓ - Step completed without exception

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Procedures	Step completed without exception	Exception/Comment
Regulation 3.100 Employee Report 2. Obtain the most recently filed copy of the Regulation 3.100 Employee Report and the applicable files for the filing of this report: a) From examination of correspondence files, reports (relating to gaming credit policy and complimentary benefits), payroll registers, disbursement journals, minutes and observations of employee activities, determine if management employees fall under any of the categories to qualify as reportable employees and are included on the Employee Report. Scope: Trace the names of 3 reportable employees from each of the records specified above to the Employee Report.		
b) For a sample of ten employees, listed on the Employee Report, verify that all disclosed information is complete (e.g., name, position title, social security number and a complete list of those categories which apply to each employee).		
c) Determine that the Employee Report was properly submitted to the Board in a timely manner (on or before the 15 th of January or July, as appropriate).		

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Procedures	Step completed without exception	Exception/Comment
d) For corporations, determine that all officers and directors have been properly licensed or have filed for licensure pursuant to NRS 463.530 and NRS 463.540.		
e) For limited-liability companies, determine that all members have been licensed or have filed for licensure pursuant to NRS 463.5735.		
f) For partnerships, determine that all partners have been licensed or have filed for licensure pursuant to NRS 463.569.		
Regulation 5.013 Gaming by, and Issuance of Gaming Credit to, Owners, Directors, Officers, and Employees 3. Obtain the current customer deposit and casino accounts receivable listings. Also obtain the Employee Report most recently submitted to the Board. Review the customer deposit and casino accounts receivable listings for names of officers, directors, and owners and a sample of 10% or 10 key employees from the key employee report, whichever amount is greater. Any casino account receivable or customer deposit for such individuals are reviewed to ensure that no play or placement of a wager occurred pursuant to Regulation 5.013(1) and for the propriety of the transaction.		

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Procedures	Step completed without exception	Exception/Comment
4. Obtain a list of the current cage department employees from the Human Resources Department and select a sample of 10% or 10 cage department employees, whichever amount is higher. Review the listings obtained in the previous step for the sample of cage department employees selected. Any casino accounts receivable or customer deposit for such individuals are reviewed for the propriety of the transaction. (Asset Protection)		
5. For one day, review the player tracking records, W2-G's, multiple transaction logs and book wagering reports for gaming winnings paid to officers, directors, owners and key employees. Regulation 5.013		
6. For one day, review disbursements made by the cage department to officers, directors, owners and key employees for gaming winnings. Regulation 5.013		
Regulation 5.105 Duties of Licensee 7. For five individuals on the current system of records, determine that an application for employment was received prior to accessing the GCB system of records. Regulation 5.105(2) Indicate the names of the five individuals reviewed and the date of the employment application.		

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8. Review the most recent monthly report of hired employees submitted to the Board to determine that it contains the proper information and that it was submitted by the specified day pursuant to Regulation 5.105(11) .		
9. Review the most recent quarterly report of terminated and separated from service employees to determine that it contains the proper information and that it was submitted by the specified day pursuant to Regulation 5.105(12) .		
10. Review the human resources files and select five gaming employees currently employed and five terminated employees to determine whether a photo of the gaming employee is being maintained. Regulation 5.105(13) Indicate the names of the gaming employees selected and status of employment.		
11. Do the photos of the gaming employees reviewed in the previous step meet the requirements of Regulation 5.105(13) ?		
Regulation 5.160 Surveillance System 12. Obtain a copy of the current surveillance system plan and determine that the plan and any amendments to the plan: a) Have been submitted to the Board.		
b) Are identical to the surveillance system in operation.		

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Regulations 6.040 and 6.060 Accounting Records and Retention 13. For all records of all transactions pertaining to revenue that is taxable or subject to fees under chapters 463 and 464 of the NRS and for all records required to be maintained by Regulation 6: a) Review procedures for document storage, retrieval, return and destruction.		
b) Perform an observation of storage facilities to determine adequacy of controls.		
c) If computerized or microfiche storage, determine that files are properly indexed by casino department and date.		
Regulation 6.050 Records of Ownership 14. Determine the location and availability of the corporate, partnership or sole proprietorship (as applicable) records of ownership identified in Regulation 6.050 .		

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Regulation 6.110(2) Hopper Adjustments 15. Obtain the supporting documentation for the adjustment to slot drop for the difference between the initial hopper loads and the total amount in the hoppers at fiscal year end. If no <u>adjustment</u> was made, determine the reasoning for this and perform steps #15a-c. If no <u>comparison</u> was made, cite a violation of Regulation 6.110(2) .		
a) Determine that the general ledger hopper account balance is reasonable.		
b) Foot hopper test results and recalculate estimated hopper totals, comparing to general ledger account balance.		
c) Determine that the adjustment to slot drop is proper.		
Regulation 6.150 Minimum Bankroll 16. Verify compliance with Regulation 6.150 by calculating available bankroll and comparing this figure to the minimum bankroll requirements.		

✓ - Step completed without exception

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<p>Regulation 8.130 Transaction Reports</p> <p>17. Review the following documents for transactions which may be reportable pursuant to Regulation 8.130. For those items determined to be reportable, trace to filings. Unless otherwise specified, documents generated during the fiscal year should be reviewed.</p> <p>a) Review loan, lease and contract files.</p> <p>Note: In conjunction with this review, be on the alert for finder's fees. Payment of finder's fees requires prior Nevada Gaming Commission approval pursuant to Regulation 5.120.</p> <p>Scope: Review all <u>new</u> loan, lease and contract agreements executed since the last review of these files.</p>		

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<p>b) Review transactions greater than \$30,000 in the disbursements journal for a minimum of two months during the fiscal year. Transactions which may be reportable pursuant to Regulation 8.130 include:</p> <p>1) Leases and capital leases.</p> <p>2) Installment purchase contracts.</p> <p>3) Loans, mortgages and trust deeds.</p> <p>4) Accounts payable and accrued expenses due to unaffiliated persons where the payment terms or actual length of payments exceed 12 months.</p> <p>Note: For disbursements which involve dividend payments to owners or distributions to non-owners/key employees, determine compliance with NRS 463.160(1)(d).</p>		

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<p>c) Review records of receipt such as the cash receipts journal and cage accountability documents for a minimum of two months during the fiscal year. Transactions which may be reportable pursuant to Regulation 8.130 include:</p> <p>1) Tenant deposits.</p> <p>2) Capital contributions and loans by a person who is a stockholder, partner or proprietor of the company.</p> <p>Note: Be aware of payments by bonding companies for losses as a result of employee embezzlement or fraud, or payments from employees making restitution for cases of theft, fraud or embezzlement. For any entries related to embezzlements, review the associated security reports and ensure that the incidents were properly reported to the Board and any recovered monies were included in gross gaming revenue, if appropriate.</p>		
<p>d) Review safekeeping deposits for a minimum of one month during the fiscal year. Deposits which may be reportable pursuant to Regulation 8.130 are those made by an individual owning, directly or indirectly, 10% interest in the company; commingled with company funds; left for more than 10 days; and aggregate to an amount greater than 25% of cash in the cage.</p>		

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<p>e) Review asset and liability accounts. Transactions which may be reportable pursuant to Regulation 8.130 include:</p> <p>1) Property donated.</p> <p>2) Conversions of accounts payable, accrued expenses or other liabilities to notes payable.</p> <p>3) Debts forgiven by a lender.</p> <p>4) Accruals of salary due to an individual directly or indirectly owning an interest in the company where the accrual period exceeds 90 days.</p> <p>Scope: Review the general ledger for a minimum of two months during the fiscal year.</p>		
<p>Regulation 12.070 Redemption and Disposal of Discontinued Chips and Tokens</p> <p>18. Determine compliance with Regulation 12.070 for any chips or tokens which were discontinued during the previous fiscal year.</p>		

✓ - Step completed without exception

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Regulation 13 Live Entertainment Tax 19. Determine whether any areas of the gaming establishment are subject to Live Entertainment Tax in which the sales have not been reported as entertainment taxable by the completing the "Entertainment Area Evaluation Form" included in the Entertainment Internal Audit Compliance Checklists. Note: This procedure is not applicable if completed when performing the Entertainment Internal Audit Checklists.		
Regulation 14.030 Approval of gaming devices and the operation of new systems; applications and procedures. Regulation 14.110 Approval to modify gaming devices or systems; applications and procedures. 20. Determine that proper approval has been received pursuant to Regulation 14.030 to operate an inter-casino linked system or received prior approval for system modifications pursuant to Regulation 14.110 .		

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License Conditions 21. Determine compliance with any and all license conditions and commission orders. Note 1: License conditions are included on form NGC-9 sent to each casino annually by the Tax and License Division. Note 2: These commission orders may be obtained from the Corporate Securities Division in Carson City, which are typically related only to publicly traded corporations.		
Compliance Committee 22. If the licensee is required to maintain a compliance committee: a) Determine that the plan has been approved by the Gaming Control Board.		
b) Determine that the committee members have all been approved by the Gaming Control Board.		
c) Determine that procedures are in effect to fulfill the requirements of the plan.		
d) Determine that the aforementioned procedures are being complied with.		

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Internet 23. Review the company's website for regulatory and statutory noncompliance. Regulations 5.011 and 22 and NRS 465.091 to .094		
<u>Procedures Modified or Added</u>		

✓ - Step completed without exception